

STATE OF TENNESSEE

Office of the Attorney General



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T.R.A. DOCKET ROOM

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Reply to:
Consumer Advocate and Protection Division
Post Office Box 20207
Nashville, TN 37202

May 17, 2004

Honorable Deborah Taylor Tate
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

**IN RE: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireless Number Portability
Obligations Pursuant to Section 251(F)(2) of the Communications Act of
1934, As Amended**

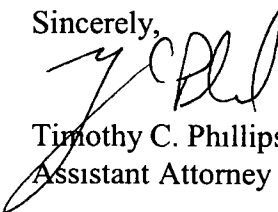
Docket No: 03-00633

Dear Chairman Tate:

Enclosed is an original and thirteen copies of the Consumer Advocate and Protection Division's Discovery Requests Served Upon The Tennessee Coalition Of Rural Incumbent Telephone Companies And Cooperatives. Please file same in this docket. Copies are being sent to all parties of record.

Should you have any questions, please contact me at 615-741-3533. Thank you.

Sincerely,


Timothy C. Phillips
Assistant Attorney General

CC: All Parties of Record.

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**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE)	
COMPANIES AND COOPERATIVES)	
REQUEST FOR SUSPENSION OF)	DOCKET NO. 03-00633
WIRELINE TO WIRELESS NUMBER)	
PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(F)(2) OF)	
THE COMMUNICATIONS ACT OF)	
1934, AS AMENDED)	

**CONSUMER ADVOCATE'S DISCOVERY REQUESTS SERVED UPON THE
TENNESSEE COALITION OF RURAL INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES**

Comes now Paul G. Summers, the Attorney General for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of the Attorney General (hereinafter "Consumer Advocate"), and propounds the following Interrogatories and Requests for Production upon the Tennessee Coalition of ("Coalition"), pursuant to Rules 26, 33 and 34 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg 1220-1-2-.11. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate & Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Russell T. Perkins.

PRELIMINARY MATTERS AND DEFINITIONS

These Interrogatories are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Coalition which would make a prior response inaccurate, incomplete, or incorrect. In addition, the Consumer Advocate requests that the Coalition

supplement responses hereto with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert at hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

Each Interrogatory calls for all knowledge which the Coalition has as a party(ies), as distinguished from the solitary knowledge of the Coalition as an entity(ies) or persons. That is to say, the answers are to include all knowledge available to the Coalition, whether it be the Coalition's solitary knowledge or the knowledge of the Coalition's attorney or other representative.

For purposes of these Interrogatories and Requests for Production, the term "you" shall mean and include: each and every company and/or cooperative making up the Coalition and which are parties in this docket and all employees, agents and representatives thereof. At any time the responses vary among the entities making up the Coalition, it is critical that you specify the differences with respect to each discovery request. Consistent with the spirit of the proceedings in this docket, these discovery are directed at each company and cooperative making up the Coalition as if each were served with separate discovery requests.

The term "identity" and "identify" as used herein, with respect to any person, means to provide their name, date of birth, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the nature of the document, and the title (if any) of the document.

The term “document” as used herein, means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of origin or location, of any book, pamphlet, periodical, letter, note, memorandum (including memoranda, note or report of a meeting or conversation), photograph, videotape, audio tape, computer disk, e-mail, or any other written, typed, reported, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody, or control. If any such document or thing was, but no longer is, in your possession or control, state what disposition was made of it and when.

If you produce documents in response to these Interrogatories, please produce the original of each document or, in the alternative, identify the location of the original document. If the “original” document is itself a copy, that copy should be produced as the original.

If any of the Interrogatories are not answered on the basis of privilege or immunity, include in your response to each such Interrogatory a written statement evidencing:

- a. the nature of the communication;
- b. the date of the communication;
- c. the identity of the persons present at such communication; and
- d. a brief description of the communication sufficient to allow the Court to rule on a motion to compel.

If any objections are raised on the basis of privilege or immunity, include in your response, a complete explanation concerning the privilege asserted.

INTERROGATORIES

Consistent with the preceding definitions and preliminary matters, answer under oath the following specific Interrogatories.

1. State each fact you rely on to support your contention(s), position(s) and/or request(s) in this docket.

RESPONSE:

2. Identify all persons known to you, your attorney, or other agent who have knowledge, information or possess any document(s) or claim to have knowledge, information or possess any document(s) which support your answer to Interrogatory number one (1) above.

RESPONSE:

3. Identify each document, photograph, or any other article or thing whatsoever, which you claim to corroborate any part of your contention(s) and/or position(s) which forms the basis for the relief you request in this docket, whether as to the issues of credibility or any other issue, or which is adverse to your contention(s) or position(s) which forms the basis for the relief you request in this docket, whether as to the issues of credibility or any other issue.

RESPONSE:

4. With respect to each person you expect to call as an expert witness, or provide any form of testimony from, in the this matter:

a. their full name and work address;

RESPONSE:

b. each subject matter about which such witness is expected to testify;

RESPONSE:

c. the substance of the facts and opinions to which the expert is expected to testify;

RESPONSE:

d. a summary of the grounds or basis of each opinion to which such witness is expected to testify; and

RESPONSE:

e. whether or not the expert has prepared a report, letter of memorandum of his findings, conclusions or opinions.

RESPONSE:

5. Identify each state, including docket and case identification, where a similar request by any company to the public utility regulatory authority has been made. Provide copies of the documents and things filed in each.

RESPONSE:

REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS

Consistent with the preceding definitions and preliminary matters, you are requested to produce the documents and things described in the following paragraphs.

1. Copies of any and all documents identified in your answers or responses to these Interrogatories.

RESPONSE:

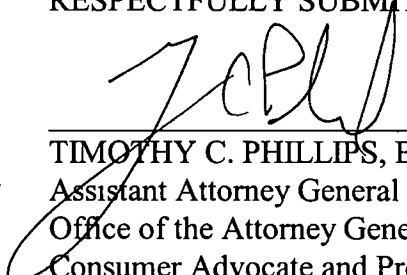
2. Copies of any and all documents reviewed to prepare your answers or responses to these Interrogatories.

RESPONSE:

3. Any and all expert reports which have been obtained from any expert.

RESPONSE:

RESPECTFULLY SUBMITTED,



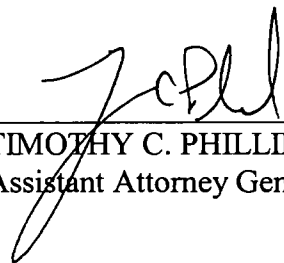
TIMOTHY C. PHILLIPS, B.P.R. #012751
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
(615) 741-8700

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on May 17, 2004, upon:

R. Dale Grimes, Esq.
Bass, Berry & Sims
Amsouth Center
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238-3001

Melvin J. Malone, Esq.
Miller & Martin PLLC
1200 One Nashville Place
150 Fourth Avenue, North
Nashville, Tennessee 37219-2433



TIMOTHY C. PHILLIPS
Assistant Attorney General

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